UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

PHARMMD SOLUTIONS, LLC,

Plaintiff,

Case No. 3:11-CV-00255

v.

Judge Haynes

PERFORMRX, LLC and

DENISE KEHOE,

Defendants.

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<u>DEFENDANT DENISE KEHOE'S EMERGENCY MOTION FOR LIMITED</u>
EXPEDITED DISCOVERY ORDER

Pursuant to Local Rule 7.01, Defendant Denise Kehoe ("Kehoe") moves this Court to grant her Emergency Motion for Limited Expedited Discovery Order and thereby allow her depose the C.E.O. of Plaintiff PharmMD Solutions, LLC ("Plaintiff"), Samuel W. "Bo" Bartholomew III ("Mr. Bartholomew"), on Friday, April 1, 2011, at 3:00 p.m., or immediately following upon the conclusion of the deposition of Kehoe set for that same date at 10:00 am. Kehoe believes that Mr. Bartholomew likely possesses information relevant to several of the claims asserted by Plaintiff in this matter, in addition to many of the defenses that Kehoe intends to assert at the preliminary injunction hearing set for Monday, April 4, 2011. In support of this Motion, Kehoe attaches the accompanying Memorandum in Support.